

1 TAYLOR-COPELAND LAW
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5 [Proposed] Lead Counsel for Plaintiff

6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA

8	In re RIPPLE LABS INC. LITIGATION,)	Case No. 4:18-cv-06753-PJH3
9)	<u>CLASS ACTION</u>
10	_____)	DECLARATION OF JAMES Q. TAYLOR-
11	This Document Relates To:)	COPELAND IN SUPPORT OF MOTION
12	ALL ACTIONS)	FOR APPOINTMENT AS LEAD
13	_____)	PLAINTIFF, AND APPROVAL OF
)	SELECTION OF COUNSEL

14 DATE: June 26, 2019
15 TIME: 9:00 a.m.
CTR: Courtroom 3 (3rd Floor)

1 I, JAMES Q. TAYLOR-COPELAND, declare as follows:

2 1. I am an attorney licensed to practice before all the courts of the State of California
3 and this Court. I am counsel for the proposed lead plaintiff in the above-captioned action, Bradley
4 Sostack. I make this declaration in support of Mr. Sostack's motion for consolidation of related
5 actions, appointment as lead plaintiff, and approval of selection of counsel. I have personal
6 knowledge of the matters stated herein and, if called upon, I could and would competently testify
7 thereto.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of the Certification of Mr.
9 Sostack.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of Taylor-Copeland Law's
11 firm resume.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed on May
13 20, 2019.

14
15 s/ James Q. Taylor-Copeland
16 JAMES Q. TAYLOR-COPELAND
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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury that the foregoing is true and correct. Executed on May 20, 2019.

s/James Taylor-Copeland

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Exhibit A

Exhibit A

CERTIFICATION PURSUANT TO THE FEDERAL SECURITIES LAWS

I, Bradley Sostack, hereby certify that the following is true and correct to the best of my knowledge, information, and belief:

2. I have reviewed the complaints in this matter and authorize the filing of lead plaintiff papers on my behalf.

3. I am willing to serve as a representative party on behalf of the purchasers of XRP tokens (the "security") during the Class Period, including providing testimony at deposition and trial if necessary.

4. During the Class Period, I purchased and/or sold the security that is the subject of the Complaint, as set forth in the attached **Schedule A**.

5. I did not engage in the foregoing transactions at the direction of counsel nor in order to participate in any private action arising under the Securities Act of 1933 (the "Securities Act") or the Securities Exchange Act of 1934 (the "Exchange Act").

6. During the three-year period preceding the date of my signing this Certification, I have not sought to serve, or served, as a representative party or lead plaintiff on behalf of a class in any private actions arising under the Securities Act or the Exchange Act.

7. I will not accept any payment for serving as a representative party on behalf of the Class beyond the *pro rata* share of any recovery, except for such reasonable costs and expenses (including lost wages) directly relating to the representation of the Class as ordered or approved by the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at St. Petersburg, FL, on the 17 of May, 2019.



Schedule A**Purchases**

Transaction Date	Consideration Paid	XRP Tokens Received for Consideration
1/3/2018 18:07	1.237517 Bitcoin	6653.319
1/3/2018 18:07	0.055491 Bitcoin	298.3407
1/3/2018 18:07	0.000371 Bitcoin	1.995
1/3/2018 18:07	0.078976 Bitcoin	424.6
1/3/2018 18:07	0.619772 Bitcoin	3332.11
1/3/2018 18:07	0.164775 Bitcoin	886.0775
1/3/2018 18:07	0.409849 Bitcoin	2204.083
1/3/2018 18:07	0.134021 Bitcoin	720.7779
1/3/2018 18:07	1.32714 Bitcoin	7138.231
1/3/2018 18:07	0.448424 Bitcoin	2412.176
1/3/2018 18:07	1.831405 Bitcoin	9852.088
1/3/2018 18:07	0.014155 Bitcoin	76.20227
1/4/2018 9:08	0.197193 Bitcoin	920
1/5/2018 9:55	0.668879 Bitcoin	3766.846
1/5/2018 9:55	2.007201 Bitcoin	11304.35
1/5/2018 9:55	0.164899 Bitcoin	928.8
1/5/2018 14:23	1.679859 Bitcoin	9958.848
1/5/2018 14:23	0.006934 Bitcoin	41.15181
1/6/2018 10:38	0.028424 Bitcoin	176.2165
1/6/2018 10:38	0.044717 Bitcoin	277.2295
1/6/2018 10:42	0.128396 Bitcoin	796.005
1/6/2018 10:42	0.04839 Bitcoin	300
1/6/2018 10:42	0.717874 Bitcoin	4450.549
1/8/2018 10:07	0.453343 Bitcoin	2781.248
1/8/2018 10:07	0.361657 Bitcoin	2218.752
1/10/2018 1:55	0.29134 Bitcoin	2023.338
1/10/2018 1:55	0.000213 Bitcoin	1.478387
1/10/2018 1:55	0.148354 Bitcoin	1030.805
1/10/2018 1:55	3.67751 Bitcoin	25554.24
1/10/2018 1:55	0.000219 Bitcoin	1.523359
1/10/2018 1:55	0.0002 Bitcoin	1.394358
1/10/2018 1:55	0.199469 Bitcoin	1387.225
1/11/2018 8:25	131.2281 USDT	70
1/16/2018 9:32	18835.16 USDT	14269.06

1/16/2018 9:32	2926 USDT	2216.667
1/16/2018 9:32	5280 USDT	4000
1/16/2018 9:33	641.0548 USDT	485.6475
1/16/2018 9:33	7943.112 USDT	6017.509

Sales

Transaction Date	Consideration Received	XRP Tokens Sold
1/9/2018 13:19	0.012616 Bitcoin	85.48702
1/9/2018 13:19	0.044274 Bitcoin	300
1/9/2018 13:19	0.02952 Bitcoin	200
1/9/2018 13:19	0.05908 Bitcoin	400
1/9/2018 13:19	0.003 Bitcoin	20.30457
1/9/2018 13:19	0.07369 Bitcoin	498.75
1/9/2018 13:19	0.170404 Bitcoin	1152.861
1/9/2018 13:19	0.000939 Bitcoin	6.349937
1/9/2018 13:19	0.018784 Bitcoin	127.0455
1/9/2018 13:19	0.011297 Bitcoin	76.38499
1/9/2018 13:19	0.138005 Bitcoin	933.0989
1/9/2018 13:19	0.001249 Bitcoin	8.444625
1/9/2018 13:19	0.030071 Bitcoin	203.2793
1/9/2018 13:19	0.003 Bitcoin	20.27986
1/9/2018 13:19	0.423424 Bitcoin	2861.939
1/9/2018 13:19	0.0296 Bitcoin	200
1/9/2018 13:19	0.127432 Bitcoin	861.0297
1/9/2018 13:19	0.02716 Bitcoin	183.5145
1/9/2018 13:19	0.011636 Bitcoin	78.53727
1/9/2018 13:19	0.401906 Bitcoin	2712.465
1/9/2018 13:19	1.347689 Bitcoin	9095.56
1/9/2018 13:19	0.423888 Bitcoin	2854.467
1/9/2018 13:19	0.275605 Bitcoin	1867.494
1/9/2018 13:19	0.294422 Bitcoin	1995
1/9/2018 13:19	0.003216 Bitcoin	21.7911
1/9/2018 13:19	0.019699 Bitcoin	133.4814
1/9/2018 13:19	0.019923 Bitcoin	135
1/9/2018 13:19	0.23946 Bitcoin	1622.578
1/9/2018 13:19	0.111128 Bitcoin	753
1/9/2018 13:19	0.058884 Bitcoin	399
1/9/2018 13:19	0.028462 Bitcoin	192.8578
1/10/2018 6:03	19 USDT	10
1/10/2018 8:55	662.5665 USDT	400

1/10/2018 8:55	4092.474 USDT	2470.68
1/10/2018 8:55	23568.06 USDT	14228.34
1/10/2018 8:55	4805.231 USDT	2900.98
1/10/2018 10:17	63.11382 USDT	33.19683
1/10/2018 10:17	4.387889 USDT	2.307958
1/10/2018 10:17	2561.995 USDT	1347.567
1/10/2018 10:17	25252.34 USDT	13282.32
1/10/2018 10:17	19.65955 USDT	10.29324
1/10/2018 10:17	0.06977 USDT	0.036529
1/10/2018 10:17	10169.38 USDT	5324.282
1/17/2018 15:27	5.53534 Bitcoin	58272.87
1/17/2018 15:27	0.03599 Bitcoin	378.8402
1/17/2018 15:27	0.000137 Bitcoin	1.447216
1/17/2018 15:27	0.000137 Bitcoin	1.447216
1/17/2018 15:27	0.000137 Bitcoin	1.447216
1/17/2018 15:27	0.010359 Bitcoin	109

Exhibit B

Exhibit B

Taylor-Copeland Law

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FIRM RESUME

Taylor-Copeland Law was one of the first firms in the country to focus on blockchain and cryptocurrency litigation and is at the forefront of this rapidly developing area of law. It is focused on representing aggrieved investors and cryptocurrency users seeking to recover financial losses in what is often described as the “wild west.”

The last two years have seen the explosive growth of blockchain technology and the value of cryptocurrencies. A blockchain is a decentralized digital ledger (such as Bitcoin or Ethereum) on which transactions (or other information) are recorded and added in chronological order. It allows participants to keep track of digital currency transactions (or information exchanges) without central record keeping. There are now hundreds of different cryptocurrencies worth more than \$500 billion—up from just \$20 billion a year ago. These currencies use encryption techniques to regulate the generation of units of currency and facilitate and verify the transfer of funds without the need for an intermediary, like a bank.

Taking advantage of this rapid growth, many blockchain and cryptocurrency startups have attempted to skirt fundraising regulations by raising funds through initial coin offerings (ICOs). In an ICO, tokens are sold to consumers in exchange for legal tender or other cryptocurrencies (most often Bitcoin and Ethereum). These tokens generally give the purchaser various rights on the blockchain network and resemble the shares of a company sold to investors in an initial public offering. Unfortunately, these ICOs have become a magnet for unscrupulous practices and fraud.

Taylor-Copeland Law focuses on helping aggrieved ICO investors, and in October 2017, Taylor-Copeland Law filed *Baker v. Dynamic Ledger Solutions*, the first suit to allege that an initial coin offering (ICO) violated U.S. securities laws. Since then Taylor-Copeland Law has helped aggrieved ICO investors recover millions of dollars in confidential settlements with ICO promoters.

Taylor-Copeland Law is also currently prosecuting claims against the four largest U.S. based cryptocurrency exchanges—Coinbase, Bittrex, Kraken, and Poloniex—on behalf of consumers who have lost assets as a result of fraud and/or negligence by those exchanges.

Professional Experience

James Taylor-Copeland began his legal career working in the litigation and dispute resolution department of the large international firm Clifford Chance US LLP in Washington, D.C. James' practice as a litigator involved all aspects of civil litigation, including significant experience with multi-district litigation and cross-border issues. In 2015, James left Clifford Chance US LLP and joined Mintz Levin Cohn Ferris Glovsky and Popeo PC in San Diego, California, where he was a member of the firm's Institutional Investor Class Action Recovery group. In 2017, James founded Taylor-Copeland Law to focus on blockchain and cryptocurrency litigation.

Bar Admissions

California, U.S. District Court, Northern District of California, U.S. District Court, Central District of California, U.S. District Court, Southern District of California, U.S. District Court, Eastern District of California.

Education

James obtained his Juris Doctorate from Georgetown University Law Center and an undergraduate degree in economics from Indiana University.

REPRESENTATIVE MATTERS

John Hastings v. Unikrn, Inc., et al.

Washington Superior Court, King County, Case No. 18-2-20303-6

- Securities class action alleging that Unikrn, Inc. violated the registration provisions of federal securities law by offering unregistered UKG securities to the general public

Ryan Coffey v. Ripple Labs, Inc., et al.

U.S. Dist. Ct. – Northern District of California – Case No. 4:18-cv-566271

- Securities class action alleging that Ripple Labs and its subsidiary XRP II violated state and federal securities laws by offering unregistered XRP securities to the general public

Andrew Baker v. Dynamic Ledger Solutions, et al.

U.S. Dist. Ct. – Northern District of California – Case No. 3:17-cv-06850

- First case alleging that sale of pre-functional tokens through an initial coin offering (ICO) violated U.S. securities laws
- Litigation against \$1.2 billion ICO promoter and its principals

Jacob Zowie Thomas Rensel et. al. v. Centra Tech, Inc., et al.

U.S. Dist. Ct. – Southern District of Florida – Case No. 1:17-cv-24500

- Appointed co-lead counsel in class action alleging that defendants violated the registration provisions of the Securities Act through the unregistered offer and sale of CTR Tokens to the general public

CrossFit, Inc. v. National Strength and Conditioning Association

U.S. Dist. Ct. – Southern District of California – Case No. 14-cv-1911

- Obtained favorable summary judgment ruling in Lanham Act action arising from manipulation of date in an article published in competitor's scientific journal
- Obtained significant monetary and evidentiary sanctions against defendant based on discovery abuses

MediVas LLC, et al. v. Marubeni Corporation

California Superior Court – County of San Diego – Case No. 37-2010-00090830

- Negotiated favorable settlement for Marubeni Corporation mid-way through a two-week jury trial in case involving hundred million dollar claims and multi-million-dollar cross-claims

Tatung Company, Ltd. v. Shu Tze Hsu, et al.

U.S. Dist. Ct. – Central District of California – Case No. SACV13-01743

- Obtained favorable summary judgment ruling and negotiated favorable settlement for client in civil RICO action arising out of a complex scheme to conceal assets